3629002VEU

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IPOX SCHUSTER, LLC,)
Plaintiff,)
v.) No: 15-cv-9955
NIKKO ASSET MANAGEMENT CO., LTD.)
and)
LAZARD ASSET MANAGEMENT LLC,)
Defendants.)

NOTICE OF MOTION

On January 27, 2016 at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Matthew F. Kennelly or any judge sitting in that judge's stead, in Courtroom 2103 located in the U.S. District Court, Northern District of Illinois, and shall then and there present Defendant Nikko Asset Management Co., Ltd.'s Motion to Extend Deadline For Defendant Nikko Asset Management Co., Ltd. to File its Response to Plaintiff's Complaint, a copy of which is hereby attached.

By: /s/Kelly V. McHale
Kelly V. McHale

Michael D. Huber (ARDC# 6191282) Kelly V. McHale (ARDC# 6298568) CRAY HUBER HORSTMAN HEIL & VanAUSDAL LLC 303 West Madison Street, Suite 2200 Chicago, Illinois 60606 Telephone: (312) 332-8450

Telephone: (312) 332-8450 Facsimile: (312) 332-8451 mdh@crayhuber.com kvm@crayhuber.com

Attorneys for Defendant Nikko Asset Management Co., Ltd.

CERTIFICATE OF SERVICE

The undersigned certifies pursuant to Fed.R.Civ.P. 5 and L.R. 5.5, that a true and correct copy of the foregoing **Notice of Motion** was filed on **January 21, 2016**, with the clerk of the court using the CM/ECF system, which will send notice to counsel of record.

By: /s/Kelly V. McHale
Kelly V. McHale

Michael D. Huber (ARDC# 6191282) Kelly V. McHale (ARDC# 6298568) CRAY HUBER HORSTMAN HEIL & VanAUSDAL LLC 303 West Madison Street, Suite 2200 Chicago, Illinois 60606 Telephone: (312) 332-8450

Telephone: (312) 332-8450 Facsimile: (312) 332-8451 mdh@crayhuber.com kvm@crayhuber.com

Attorneys for Defendant Nikko Asset Management Co., Ltd.

RE: Ipox Schuster, LLC v. Nikko Asset Management Co., Ltd. and Lazard Asset

Management, LLC

Court No.: 15-cv-9955 Our File No.: 3629002VEU

SERVICE LIST

ATTORNEYS FOR PLAINTIFF:

Patrick T. Stanton (No. 6216899) Aaron D. Charfoos (No. 6277242) Kara B. Murphy (No. 6309748) Dykema Gossett PLLC 10 S. Wacker Drive Suite 2300 Chicago, IL 60606

TEL: (312) 876-1700 FAX: (312) 876-1155

Marsha G. Gentner (*pro hac vice* forthcoming) Dykema Gossett PLLC Franklin Square Building 1300 I Street N.W. Suite 300 West Washington, D.C. 20005

TEL: (202) 906-8600